

EXHIBIT 1

Monday, May 5, 2025 at 17:24:40 Central Daylight Time

Subject: Re: Williams v. Tessman, et al. - Amd SDT to IDOC Intel
Date: Wednesday, April 30, 2025 at 7:29:47 AM Central Daylight Time
From: Claudia C. Fantauzzo
To: John Marrese
CC: Laura M. Ranum, Brian Eldridge, Morgan Forbes, Paige Smith, Antonio Romanucci, Josh M. Engquist, Alexis M. Gamboa, Valerie Stubbe
Attachments: image001.png, image002.png

John,

This issue took months to litigate the first time. We cannot proceed with some depositions until this is resolved and it is unlikely the court will grant us another discovery extension.

Asking IDOC to hold on to the calls until there is a ruling on the motion should alleviate your concerns about their premature production.

Claudia

On Apr 29, 2025, at 8:20AM, John Marrese <jmarrese@hmelegal.com> wrote:

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Claudia,

You have taken months collectively to respond to me on this particular subpoena. You're giving me until tomorrow to file a brief quashing it? That doesn't seem very reasonable.

Sincerely,
John

John Marrese | Partner
Hart McLaughlin & Eldridge
<image002.png> One South Dearborn, Suite 1400
Chicago, Illinois 60603
jmarrese@hmelegal.com
o: 312.971.9074 | c: 312.841.8354

From: Claudia C. Fantauzzo <CFantauzzo@jsotoslaw.com>
Date: Tuesday, April 29, 2025 at 8:17 AM
To: John Marrese <jmarrese@hmelegal.com>
Cc: Laura M. Ranum <L.Ranum@jsotoslaw.com>, Brian Eldridge <beldridge@hmelegal.com>, Morgan Forbes <mforbes@hmelegal.com>, Paige Smith <PSmith@hmelegal.com>, Antonio Romanucci <aromanucci@rblaw.net>, Josh M. Engquist <JEngquist@jsotoslaw.com>, Alexis M. Gamboa <AGamboa@jsotoslaw.com>, Valerie Stubbe <VStubbe@jsotoslaw.com>
Subject: RE: Williams v. Tessman, et al. - Amd SDT to IDOC Intel

John,

We will hold off until EOB tomorrow. If your motion is on file, we will not issue the subpoena.

Sincerely,

Claudia C. Fantauzzo

The Sotos Law Firm, P.C.

141 W. Jackson Blvd. #1240A
Chicago, IL 60604
Direct Line 630-735-3305
Cell Phone 630-267-7014

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From: John Marrese <jmarrese@hmelegal.com>
Sent: Monday, April 28, 2025 1:50 PM
To: Claudia C. Fantauzzo <CFantauzzo@jsotoslaw.com>
Cc: Laura M. Ranum <LRanum@jsotoslaw.com>; Brian Eldridge <beldridge@hmelegal.com>; Morgan Forbes <mforbes@hmelegal.com>; Paige Smith <PSmith@hmelegal.com>; Antonio Romanucci <aromanucci@rblaw.net>; Josh M. Engquist <JEngquist@jsotoslaw.com>; Alexis M. Gamboa <AGamboa@jsotoslaw.com>; Valerie Stubbe <VStubbe@jsotoslaw.com>
Subject: Re: Williams v. Tessman, et al. - Amd SDT to IDOC Intel

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Claudia,

We are moving to quash in entirety again. As such, it does not make sense to issue the subpoena until the Court rules on it.

Sincerely,

John

John Marrese | Partner
Hart McLaughlin & Eldridge
[<image001.png>](image001.png) One South Dearborn, Suite 1400
Chicago, Illinois 60603
jmarrese@hmelegal.com
o: 312.971.9074 | c: 312.841.8354

From: Claudia C. Fantauzzo <CFantauzzo@jsotoslaw.com>
Date: Monday, April 28, 2025 at 12:17 PM
To: John Marrese <jmarrese@hmelegal.com>
Cc: Laura M. Ranum <LRanum@jsotoslaw.com>, Brian Eldridge <beldridge@hmelegal.com>, Morgan Forbes <mforbes@hmelegal.com>, Paige Smith <PSmith@hmelegal.com>

<PSmith@hmelegal.com>, Antonio Romanucci <aromanucci@rblaw.net>, Josh M. Engquist <JEngquist@jsotoslaw.com>, Alexis M. Gamboa <AGamboa@jsotoslaw.com>, Valerie Stubbe <VStubbe@jsotoslaw.com>

Subject: RE: Williams v. Tessman, et al. - Amd SDT to IDOC Intel

John,

Following up again. We need to resolve this issue before we can proceed with some of the remaining depositions. When we last spoke, you indicated we were at an impasse. I held off on issuing the subpoena as a courtesy, at your request. I am available until 3:30 today for a call. Otherwise, we will issue the subpoena this afternoon.

Sincerely,

Claudia C. Fantauzzo

The Sotos Law Firm, P.C.

141 W. Jackson Blvd. #1240A
Chicago, IL 60604
Direct Line 630-735-3305
Cell Phone 630-267-7014

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From: Claudia C. Fantauzzo

Sent: Thursday, April 24, 2025 6:42 PM

To: John Marrese <jmarrese@hmelegal.com>

Cc: Laura M. Ranum <LRanum@jsotoslaw.com>; Brian Eldridge <beldridge@hmelegal.com>; Morgan Forbes <mforbes@hmelegal.com>; Paige Smith <PSmith@hmelegal.com>; Antonio Romanucci <aromanucci@rblaw.net>; Josh M. Engquist <JEngquist@jsotoslaw.com>; Alexis M. Gamboa <AGamboa@jsotoslaw.com>; Valerie Stubbe <VStubbe@jsotoslaw.com>

Subject: RE: Williams v. Tessman, et al. - Amd SDT to IDOC Intel

John,

I'm available for a call at 10am tomorrow.

Sincerely,

Claudia C. Fantauzzo

The Sotos Law Firm, P.C.

141 W. Jackson Blvd. #1240A
Chicago, IL 60604
Direct Line 630-735-3305
Cell Phone 630-267-7014

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From: John Marrese <jmarrese@hmelegal.com>
Sent: Thursday, April 24, 2025 12:14 PM
To: Claudia C. Fantauzzo <CFantauzzo@jsotoslaw.com>
Cc: Laura M. Ranum <L.Ranum@jsotoslaw.com>; Brian Eldridge <beldridge@hmelegal.com>; Morgan Forbes <mforbes@hmelegal.com>; Paige Smith <PSmith@hmelegal.com>; Antonio Romanucci <aromanucci@rblaw.net>; Josh M. Engquist <JEngquist@jsotoslaw.com>; Alexis M. Gamboa <AGamboa@jsotoslaw.com>; Valerie Stubbe <VStubbe@jsotoslaw.com>
Subject: Re: Williams v. Tessman, et al. - Amd SDT to IDOC Intel

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Claudia,

I haven't had a chance to review your latest email, but do not issue the subpoena. Based on prior dealings with IDOC, you have been getting immediate responses and once had documents produced that shouldn't have been. Moreover, it makes no sense for IDOC to work on a subpoena that is being disputed and may very well be quashed.

We can have a call after I review your latest email.

Sincerely,
John

John Marrese | Partner
Hart McLaughlin & Eldridge
jmarrese@hmelegal.com
 One South Dearborn, Suite 1400
Chicago, Illinois 60603
o: 312.971.9074 | c: 312.841.8354

From: Claudia C. Fantauzzo <CFantauzzo@jsotoslaw.com>
Date: Thursday, April 24, 2025 at 11:59 AM
To: John Marrese <jmarrese@hmelegal.com>
Cc: Laura M. Ranum <L.Ranum@jsotoslaw.com>, Brian Eldridge <beldridge@hmelegal.com>, Morgan Forbes <mforbes@hmelegal.com>, Paige Smith <PSmith@hmelegal.com>, Antonio Romanucci <aromanucci@rblaw.net>, Josh M. Engquist <JEngquist@jsotoslaw.com>, Alexis M. Gamboa <AGamboa@jsotoslaw.com>, Valerie Stubbe <VStubbe@jsotoslaw.com>
Subject: RE: Williams v. Tessman, et al. - Amd SDT to IDOC Intel

John,

We will be issuing the subpoena to IDOC this afternoon and will ask them to gather the requested calls but hold off on producing them given your objections and impending motion.

Sincerely,

Claudia C. Fantauzzo

The Sotos Law Firm, P.C.

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Chicago, IL 60604
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Cell Phone 630-267-7014

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From: Claudia C. Fantauzzo

Sent: Wednesday, April 23, 2025 9:01 AM

To: John Marrese <jmarrese@hmelegal.com>

Cc: Laura M. Ranum <L Ranum@jsotoslaw.com>; Brian Eldridge <beldridge@hmelegal.com>; Morgan Forbes <mforbes@hmelegal.com>; Paige Smith <PSmith@hmelegal.com>; Antonio Romanucci <aromanucci@rblaw.net>; Josh M. Engquist <JEngquist@jsotoslaw.com>; Alexis M. Gamboa <AGamboa@jsotoslaw.com>

Subject: RE: Williams v. Tessman, et al. - Amd SDT to IDOC Intel

John-

I am following up on our 4/17 discussion regarding our subpoena for your client's recorded IDOC calls. At that time, I reiterated our position that the electronic messages your client wrote to many of the below witnesses wherein he discussed various aspects of the case—which he wrote during the same narrowly-tailored timeframes enumerated in the rider to our second subpoena to IDOC—support our contention that the calls we are seeking are relevant and discoverable. These written messages also contradict your client's assertion that he did not speak about the case with these witnesses, particularly as it relates to his cousin, Sarelda Heath, with whom it appears he discussed the case regularly. Since there was some confusion on your part as to the specific messages I referenced during our meeting, I have attached them here along with our response to your motion to quash the previous IDOC subpoena (see pp. 9-10) which sets forth in detail the relevant topics your client discussed in each message.

While we appreciate your client's admission that he "probably mentioned" case updates and DNA evidence during some of these calls, to baselessly characterize the frequency ("not so much") and detail ("high-level mentions or reports") with which your client discussed the case to support your objection to the subpoena is both inappropriate and without merit.

Ultimately, you stated that if we were unwilling to further narrow our request, you would maintain your objection to the subpoena in its entirety. As such, it appears we are at an impasse. Please let us know when you intend to file your motion.

Unrelatedly, you also indicated during our discussion that you were in receipt of the video related to the trash pull discussed during Mr. Ecklund's deposition. Please produce it as soon as possible.

Sincerely,

Claudia C. Fantauzzo

The Sotos Law Firm, P.C.

141 W. Jackson Blvd. #1240A
Chicago, IL 60604
Direct Line 630-735-3305
Cell Phone 630-267-7014

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From: John Marrese <jmarrese@hmelegal.com>

Sent: Tuesday, March 18, 2025 5:43 PM

To: Claudia C. Fantauzzo <CFantauzzo@jsotoslaw.com>

Cc: Laura M. Ranum <LRanum@jsotoslaw.com>; Brian Eldridge <beldridge@hmelegal.com>; Morgan Forbes <mforbes@hmelegal.com>; Paige Smith <PSmith@hmelegal.com>; Antonio Romanucci <aromanucci@rblaw.net>

Subject: Re: Williams v. Tessman, et al. - Amd SDT to IDOC Intel

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Claudia,

We spoke to Herman at length.

Herman does not believe he spoke with his aunt (Janet Baker), cousins (Sarelda Heath or Mary Price), uncle (Charles Williams) or stepmother (Cheryl Williams) about the case. I don't know that he can say with 100% certainty that he didn't mention his case, but these are not people he would have discussed his case with any frequency. The vast majority of the discussion would be personal.

In terms of his sister (Carolyn), mother (also Carolyn), father (Herman), and friend (Matthew Logallo), he probably would have mentioned case updates to them in terms of things that he filed or happenings in the case that were of public record. For example, he believes he probably mentioned that DNA was being sent to a lab for testing. These folks would have received high-level mentions or reports. But again, the discussions here would primarily have been personal.

As for his kids Charlie, Crystal, and friends, he recalls those conversations being mostly about how their lives were going – personal matters -- not so much about the case. I don't think he can say he absolutely never mentioned something that happened in his case to them. But generally these folks were not ones he was discussing the case with.

He can't pinpoint the content of particular phone calls. Further, given the breadth of the affidavit you are seeking – that he didn't mention his case at any time in a call with a particular individual – he cannot provide that.

Let me know if the above information prompts you to narrow your requests or come up with another proposal in a way that does not require production of years' worth of personal calls

that will have nothing to do with the case.

Sincerely,
John

John Marrese I Partner
Hart McLaughlin & Eldridge
 One South Dearborn, Suite 1400
Chicago, Illinois 60603
jmarrese@hmelegal.com
o: 312.971.9074 | c: 312.841.8354

From: John Marrese <jmarrese@hmelegal.com>
Date: Thursday, March 13, 2025 at 10:56 AM
To: Claudia C. Fantauzzo <CFantauzzo@jsotolaw.com>
Cc: Laura M. Ranum <L.Ranum@jsotolaw.com>, Brian Eldridge
<beldridge@hmelegal.com>, Morgan Forbes <mforbes@hmelegal.com>, Paige Smith
<PSmith@hmelegal.com>, Antonio Romanucci <aromanucci@rblaw.net>
Subject: Re: Williams v. Tessman, et al. - Amd SDT to IDOC Intel

Claudia,

I am checking with Herman to see what we can do here. I would very much prefer not to brief another motion to quash, but I need to see what I can do. I will let you know ASAP.

Sorry about No. 5 and 6. You are correct I have no objection to No. 6. I don't think No. 5 is appropriately targeted but if we are able to reach a narrowed agreement on 1-4, I wouldn't raise an objection on 5 alone.

I will get back to you ASAP.

Sincerely,
John

John Marrese I Partner
Hart McLaughlin & Eldridge
 One South Dearborn, Suite 1400
Chicago, Illinois 60603
jmarrese@hmelegal.com
o: 312.971.9074 | c: 312.841.8354

From: Claudia C. Fantauzzo <CFantauzzo@jsotolaw.com>
Date: Thursday, March 13, 2025 at 9:28 AM
To: John Marrese <jmarrese@hmelegal.com>
Cc: Laura M. Ranum <L.Ranum@jsotolaw.com>, Brian Eldridge
<beldridge@hmelegal.com>, Morgan Forbes <mforbes@hmelegal.com>, Paige Smith
<PSmith@hmelegal.com>, Antonio Romanucci <aromanucci@rblaw.net>
Subject: RE: Williams v. Tessman, et al. - Amd SDT to IDOC Intel

John –

Following up on this. Please let us know your position or if another call might be helpful so we can avoid unnecessarily litigation.

Sincerely,

Claudia C. Fantauzzo

The Sotos Law Firm, P.C.

141 W. Jackson Blvd. #1240A
Chicago, IL 60604
Direct Line 630-735-3305
Cell Phone 630-267-7014

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From: Claudia C. Fantauzzo
Sent: Tuesday, March 4, 2025 9:02 AM
To: John Marrese <jmarrese@hmelegal.com>
Cc: Laura M. Ranum <L.Ranum@jsotoslaw.com>; Brian Eldridge <beldridge@hmelegal.com>; Morgan Forbes <mforbes@hmelegal.com>; Paige Smith <PSmith@hmelegal.com>; Antonio Romanucci <aromanucci@rblaw.net>
Subject: RE: Williams v. Tessman, et al. - Amd SDT to IDOC Intel

John –

Regarding Request No. 1 – All the calls were made to Plaintiff's 26(a) witnesses—witnesses with whom he admitted discussing this case. Previously discovered evidence in form of his written messages supports our contention that relevant information will be found in those calls. Obviously, we cannot know which specific calls those are until we review them. However, your client has this knowledge. To avoid further litigation on this issue, is he willing to identify the calls during which he spoke about the case with these disclosed witnesses?

Regarding Request Nos. 2-4 – The periods of calls we are requesting are narrowed to times during which it is likely your client was discussing information relevant to this case, for the reasons we discussed on our call. Further, he discussed the case in his written messages during those same time periods, which further supports our request. Plaintiff has admitted discussing the case with “innumerable” people, making it—by definition—impossible for us to enumerate them or, in your words, provide a list of calls that are more “properly targeted.” Once again, however, this is information within your client's knowledge. Is he willing to sign an affidavit stating that he did not speak with specific individuals included in his PAN list (SDT-ICOC-Intel 44) to resolve this issue?

Your email does not address Request Nos. 5 & 6 so we assume you have no objection to those calls.

Please let us know your position.

Sincerely,

Claudia C. Fantauzzo

The Sotos Law Firm, P.C.

141 W. Jackson Blvd. #1240A
Chicago, IL 60604
Direct Line 630-735-3305
Cell Phone 630-267-7014

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From: John Marrese <jmarrese@hmelegal.com>

Sent: Wednesday, February 19, 2025 4:13 PM

To: Claudia C. Fantauzzo <CFantauzzo@jsotoslaw.com>

Cc: Laura M. Ranum <LRanum@jsotoslaw.com>; Brian Eldridge <beldridge@hmelegal.com>; Morgan Forbes <mforbes@hmelegal.com>; Paige Smith <PSmith@hmelegal.com>; Antonio Romanucci <aromanucci@rblaw.net>

Subject: Re: Williams v. Tessman, et al. - Amd SDT to IDOC Intel

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Claudia,

I understand that you will not be limiting Request No. 1. Accordingly, we object as it seeks all calls during the entirety of Herman's incarceration with several family members. That is not properly targeted and I believe inconsistent with the case law and court order in this case, which has already been briefed and discussed at length.

Request Nos 2-4 have no limitation in terms of caller. On our call, you explained those requests as being interested in timeframes relating to the retesting of evidence and Herman's attorney's meetings with the State's Attorney Office on post-conviction. However, these requests effectively seek a years' worth of calls without any other limitation. Accordingly, these are not properly targeted and we object to these as well.

Let us know if you have any interest in narrowing your requests further or if we are at an impasse.

Sincerely,
John



John Marrese | Partner
Hart McLaughlin & Eldridge
One South Dearborn, Suite 1400
Chicago, Illinois 60603
jmarrese@hmelegal.com
o: 312.971.9074 | f: 312.971.9243

On Feb 11, 2025, at 2:11 PM, Claudia C. Fantauzzo

<CFantauzzo@jsotoslaw.com> wrote:

Hi John-

This is to follow up on our phone call last week regarding our 12-23-24 subpoena to IDOC for your client's recorded calls.

Specifically, as it relates to paragraph 1 of the rider to the subpoena, we will not be limiting our request for calls to any specific timeframe. While there are 12 phone numbers listed in that paragraph, they all belong to only four individuals: your client's father, daughter, sister, and cousin (Sarelda Heath), all of whom are listed in your Rule 26(a) disclosures as witnesses having knowledge relevant to this case and each of whom communicated with your client about the case while he was incarcerated, as revealed by the discovery produced thus far in this litigation.

Please let us know your position on all the communications referenced in the rider, which were each discussed on our call.

Sincerely,

Claudia C. Fantauzzo

The Sotos Law Firm, P.C.
141 W. Jackson Blvd. #1240A
Chicago, IL 60604
Direct Line 630-735-3305
Cell Phone 630-267-7014

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From: John Marrese <jmarrese@hmelegal.com>
Sent: Wednesday, February 5, 2025 10:04 AM
To: Claudia C. Fantauzzo <CFantauzzo@jsotoslaw.com>
Cc: Laura M. Ranum <L.Ranum@jsotoslaw.com>
Subject: Re: Williams v. Tessman, et al. - Amd SDT to IDOC Intel

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Thanks. Please call me then at 312-841-8354.


John Marrese | Partner
Hart McLaughlin & Eldridge
One South Dearborn, Suite 1400
Chicago, Illinois 60603
jmarrese@hmelegal.com
o: 312.971.9074 | f: 312.971.9243

On Feb 5, 2025, at 10:03 AM, Claudia C. Fantauzzo <CFantauzzo@jsotolaw.com> wrote:

Hi John, yes 3:30 works. Thanks.

On Feb 5, 2025, at 9:20 AM, John Marrese <jmarrese@hmelegal.com> wrote:

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Claudia:

Can you do 3:30 or 4 today?

Thanks,



John Marrese | Partner
Hart McLaughlin & Eldridge
One South Dearborn, Suite 1400
Chicago, Illinois 60603
jmarrese@hmelegal.com
o: 312.971.9074 | f: 312.971.9243

On Feb 4, 2025, at 4:26 PM, Claudia C. Fantauzzo <CFantauzzo@jsotolaw.com> wrote:

Thanks, John. Tomorrow afternoon works. 2pm?

From: John Marrese <jmarrese@hmelegal.com>
Sent: Tuesday, February 4, 2025 10:54 AM
To: Claudia C. Fantauzzo <CFantauzzo@jsotolaw.com>
Cc: Laura M. Ranum <L.Ranum@jsotolaw.com>
Subject: Re: Williams v. Tessman, et al. - Amd SDT to IDOC Intel

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Claudia,

Wednesday afternoon or Thursday afternoon work.

Sincerely,
John



John Marrese | Partner
Hart McLaughlin & Eldridge
One South Dearborn, Suite 1400
Chicago, Illinois 60602
jmarrese@hmelegal.com
o: 312.971.9074 | f: 312.971.9243

On Jan 31, 2025, at 3:57 PM,
Claudia C. Fantauzzo
<CFantauzzo@jsotolaw.com>
wrote:

John –

I apologize. We had some last-minute scheduling conflicts and haven't had the opportunity to circle back on this? Can you send me your availability for a call next week about this subpoena?

Sincerely,

Claudia C. Fantauzzo

The Sotos Law Firm, P.C.
141 W. Jackson Blvd. #1240A
Chicago, IL 60604
Direct Line 630-735-3305
Cell Phone 630-267-7014

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From: John Marrese
<jmarrese@hmelegal.com>
Sent: Wednesday, January 15, 2025
6:36 AM
To: Claudia C. Fantauzzo

<CFantauzzo@jsotoslaw.com>
Cc: Laura M. Ranum
<LRanum@jsotoslaw.com>; Alexis M. Gamboa <AGamboa@jsotoslaw.com>; Steven Hart <shart@hmelegal.com>; Carter Grant <cgrant@hmelegal.com>; Brian Eldridge <beldridge@hmelegal.com>; Paige Smith <PSmith@hmelegal.com>; b.raveendran@rblaw.net; sharton@rblaw.net; pdriscoll <pdriscoll@rblaw.net>; Dana Kondos <dkondos@rblaw.net>; mkujawa@schainbanks.com; dostvig@schainbanks.com; stephanie.weiner@heplerbroom.com; joseph.fay@heplerbroom.com; tekl@eklwilliams.com; tstanker@eklwilliams.com; Eileen E. Rosen <erosen@rfclaw.com>; agrill@rfclaw.com; bjohnson@rfclaw.com; rebecca.laue@cookcountysao.org; jessica.wasserma@cookcountysao.org; tdicianni@ancelglink.com; mnash@eklwilliams.com; pwalker@schainbanks.com; Morgan Forbes <mforbes@hmelegal.com>; Kara Hutson <khutson@rfclaw.com>; Josh M. Engquist <JEngquist@jsotoslaw.com>
Subject: Re: Williams v. Tessman, et al.
- Amd SDT to IDOC Intel

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Friday afternoon works.

On Jan 13, 2025, at
8:13 PM, Claudia C.
Fantauzzo
<CFantauzzo@jsotoslaw.com> wrote:

Hi John –

What is your availability this week to confer about the new SDT for recorded calls?

Sincerely,

Claudia C. Fantauzzo

The Sotos Law Firm, P.C.
141 W. Jackson Blvd. #1240A
Chicago, IL 60604
Direct Line 630-735-3305
Cell Phone 630-267-7014

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From: John Marrese
<jmarrese@hmelegal.com>
>
Sent: Friday, December
20, 2024 3:01 PM
To: Laura M. Ranum
<LRanum@jsotoslaw.com>
>; Alexis M. Gamboa
<AGamboa@jsotoslaw.co m>
Cc: Steven Hart
<shart@hmelegal.com>;
Carter Grant
<cgrant@hmelegal.com>;
Brian Eldridge
<beldridge@hmelegal.com>
>; Paige Smith
<PSmith@hmelegal.com>;
[b.raveendran@rblaw.net](mailto:<b.raveendran@rblaw.net>); [s harton@rblaw.net](mailto:<s harton@rblaw.net>);
pdriscoll
<pdriscoll@rblaw.net>;
Dana Kondos
<dkondos@rblaw.net>; [mk ujawa@schainbanks.com](mailto:<mk ujawa@schainbanks.com>);
[dostvig@schainbanks.com](mailto:<dostvig@schainbanks.com>);
[stephanie.weiner@hepler broom.com](mailto:<stephanie.weiner@hepler broom.com>); [joseph.fay@heplerbroom.com](mailto:<joseph.fay@heplerbroom.com>); [tekl@eklwilliams.com](mailto:<tekl@eklwilliams.com>); [tstanker@eklwilliams.com](mailto:<tstanker@eklwilliams.com>)

williams.com; Eileen E. Rosen <erosen@rfclaw.com>; agrill@rfclaw.com; bjohnson@rfclaw.com; rebecca.laue@cookcountysao.org; jessica.wasserman@cookcountysao.org; tdicianni@ancelglink.com; mnash@ekwilliams.com; pwalker@schainbanks.com; Morgan Forbes <mforbes@hmelegal.com>; Kara Hutson <khutson@rfclaw.com>; Laura M. Ranum <L.Ranum@jsotolaw.com>; Josh M. Engquist <JEngquist@jsotolaw.com>; Alexis M. Gamboa <AGamboa@jsotolaw.com>; Claudia C. Fantauzzo <CFantauzzo@jsotolaw.com>
Subject: Re: Williams v. Tessman, et al. - Amd SDT to IDOC Intel

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Laura, Alexis:

Plaintiff objects to this subpoena on its face on the same grounds as the prior subpoena. The subpoena appears to seek a minimum of roughly 1,000 calls. However, we only have data going back to 2019 and RFP #1 seeks calls to several numbers for the entirety of Herman's

incarceration, so it may be much more.

Please hold off on issuance until we have met and conferred as to how you this subpoena targets relevant information.

Sincerely,
John



John Marrese | Partner
Hart McLaughlin & Eldridge
One South Dearborn, Suite 1400
Chicago, Illinois 60603
jmarrese@hmelegal.com
o: 312.971.9074 | c: 312.841.8354

On Dec 20,
2024, at
11:35 AM,
Valerie
Stubbe
<VStubbe@jsotolaw.com> wrote:

Dear
Counsel,

On behalf of
counsel for
the Lake
County
Defendants,
the Vernon
Hills
Defendants,
and
Defendant
Idleburg,
attached
please
find an
amended
subpoena
duces tecum
to Illinois
Department
of

Corrections –
Intel Center,
which will be
served via
U.S. Certified
Mail on
Monday
morning.
Thank you.

**Best
regards,
Valerie
Stubbe
Senior
Paralegal**

**The Sotos
Law Firm,
P.C.**

141 W.
Jackson Blvd.,
Suite 1240A
Chicago, IL
60604
Direct Line:
(630) 735-
3306
Fax: (630)
773-0980

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